

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jerome J. Nypaver	Debtor(s)	CHAPTER 13
LYCASTE LLC		
vs.	Movant	
Jerome J. Nypaver		NO. 21-22494 GLT
	Debtor(s)	
Ronda J. Winnecour, Esq.		
	Trustee	

**MOTION OF LYCASTE LLC TO ALLOW FILING OF CLAIM**

Movant, by and through its Attorney, KML Law Group, P.C, hereby brings this Motion to Allow Filing of Claim and in support thereof avers the following;

1. Movant is LYCASTE LLC.
2. Movant is the holder of a secured claim in the above referenced matter.
3. Movant has prepared a proof of claim for filing, setting forth pre-petition arrears in the amount of \$128,929.40. A copy of the proposed proof of claim is attached as Exhibit "A" hereto.
4. The bar date for filing claims was January 27, 2022.
5. The Debtor's confirmed plan provides for payment of arrears through a loan modification which has not yet been obtained, nor is guaranteed.
6. There will be no prejudice to the Debtor if the Motion to Allow Filing of Claim is allowed.

WHEREFORE, Movant respectfully requests that this Court enter an Order allowing the filing of a Proof of Claim.

Date: September 12, 2022

/s/ Denise Carlon, Esquire  
Denise Carlon, Esquire  
KML Law Group, P.C.  
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